

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
GLOBAL EAGLE ENTERTAINMENT	:	Case No. 20-11835 (JTD)
INC., <i>et al.</i> , ¹	:	
	:	(Jointly Administered)
Debtors.	:	
	:	Obj. Deadline: May 24, 2021 at 4:00 p.m. (ET)
	:	Hearing Date: June 9, 2021 at 1:00 p.m. (ET)

NOTICE OF OBJECTION

TO: (A) THE U.S. TRUSTEE; (B) COUNSEL TO THE CREDITORS' COMMITTEE; (C) HOLDERS OF DISPUTED CLAIMS; AND (D) ANY PARTY THAT HAS FILED A RENEWED REQUEST FOR NOTICE IN THE CHAPTER 11 CASES PURSUANT TO LOCAL RULE 2002

PLEASE TAKE NOTICE that the Plan Administrator in the above-captioned cases has filed the attached *Plan Administrator's Seventh Omnibus Objection to Claims (Substantive)* (the "**Objection**").

PLEASE TAKE FURTHER NOTICE that any responses (each, a "**Response**") to the relief requested in the Objection must be filed on or before **May 24, 2021 at 4:00 p.m. (ET)** (the "**Response Deadline**") with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 (the "**Court**"). At the same time, any party submitting a Response (each, a "**Respondent**") must serve a copy of its Response upon the undersigned counsel to the Plan Administrator so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

- (a) a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are: Global Eagle Entertainment Inc. (7800), Airline Media Productions, Inc. (2314), Emerging Markets Communications, LLC (0735), Entertainment in Motion, Inc. (3908), Global Eagle Entertainment Operations Solutions, Inc. (3375), Global Eagle Services, LLC (7899), Global Eagle Telecom Licensing Subsidiary LLC (2547), IFE Services (USA), Inc. (2120), Inflight Productions USA Inc. (8493), Maritime Telecommunications Network, Inc. (9974), MTN Government Services, Inc. (6069), MTN International, Inc. (8559), MTN License Corp. (0314), N44HQ, LLC (0570), Post Modern Edit, Inc. (6256), Row 44, Inc. (2959), and The Lab Aero, Inc. (9831). The Debtors' address is 1821 E. Dyer Road, Suite 125, Santa Ana, California 92705.

- (b) the name of the Respondent and a description of the basis for the amount and classification asserted in the Disputed Claim (as defined in the Objection), if applicable;
- (c) a concise statement setting forth the reasons why the Disputed Claim should not be disallowed, reclassified, reduced, or otherwise modified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the Respondent will rely in opposing the Objection at the Hearing (as defined below);
- (d) all documentation or other evidence of the Disputed Claim, to the extent not included with the proof of claim, upon which the Respondent will rely in opposing the Objection at the Hearing;
- (e) the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) possessing ultimate authority to reconcile, settle, or otherwise resolve the Disputed Claim on behalf of the Respondent; and
- (f) the name, address, telephone number, and fax number of the person(s) (who may be the claimant or a legal representative thereof) to whom the Plan Administrator should serve any reply to the Response.

PLEASE TAKE FURTHER NOTICE THAT A HEARING (THE “HEARING”) TO CONSIDER THE OBJECTION WILL BE HELD ON JUNE 9, 2021 AT 1:00 P.M. (ET) BEFORE THE HONORABLE JOHN T. DORSEY, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM NO. 5, WILMINGTON, DELAWARE 19801.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS OR RESPONSES TO THE OBJECTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR A HEARING.

[Signature Page Follows]

Dated: May 10, 2021
Wilmington, Delaware

**YOUNG CONAWAY STARGATT &
TAYLOR, LLP**

/s/ Betsy L. Feldman

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